

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

-----X  
Jinhua Hibo Technology Co., Ltd. and Jinhua Jobo  
Technology Co., Ltd.

Civil Action No.:

Plaintiffs,

2:24-cv-08257-CCC-JSA

-against-

Hon. Jessica S. Allen

USmartPlus Inc. D.B.A. Marble Online Corp.,  
Defendant.  
-----X

**Status Report**

Dear Judge Allen:

Plaintiffs' counsel respectfully submits this letter to provide the Court with a status update in the captioned civil action.

Plaintiffs' counsel prepared a Joint Status Report, exactly in the wording below, and emailed it to defendant's counsel this morning for defendant's counsel's approval or disapproval. Plaintiffs' counsel then followed up with defendant's counsel later in the afternoon multiple times by e-mail and voicemail. Despite following up and waiting until night, we have not received a response as of yet and, given the deadline, must submit this status letter on behalf of plaintiffs alone. To the extent that the below presents the parties' agreement to make no issue of certain things, that agreement is now only proposed but not yet mutually accepted.

Pursuant to the Court's Text Order dated April 1, 2025, Defendant's counsel filed a document entitled "Joint Discovery Plan" on April 7, 2025 (docket #23). However, despite the title, this filing was submitted solely by Defendant's counsel and contains assertions that Plaintiffs' counsel respectfully contests. Specifically:

- (1) Document Production: Contrary to Defendant's characterization of Plaintiffs' responses as "bare-bone," Plaintiffs produced all available responsive documents on March 31, 2025, totaling over 375 pages (approximately 74,744 KB in size).

In contrast, Defendant produced only 101 pages—less than one-third the volume of Plaintiffs' production. Plaintiffs therefore dispute the characterization of their submission as deficient and "bare bones."

Therefore, Defendant withdraws its representation to the Court that Plaintiffs' response was "bare bones."

- (2) Timeliness of Defendant's Production: Defendant served its responses to Plaintiffs' Requests for Production on April 7, 2025—seven days past the agreed deadline, not five as asserted in Defendant's filing.

Plaintiffs agree, as a professional courtesy, to make no issue as to Defendant's response.

The parties have exchanged their deposition notices, which shall be completed by the end of June 2025.

Further, the parties have been engaged in settlement negotiations. Plaintiffs are waiting for Defendant's response after Plaintiffs' counteroffer.

Dated: New York, New York  
April 23, 2025

Respectfully submitted,

MAZZOLA LINDSTROM, LLP



---

Shan (Jessica) Chen  
*Counsel for plaintiffs*  
1350 Avenue of the Americas, 2nd Floor  
New York, New York 10019  
(d) 646-416-6280  
(m) 347-652-9046  
[jessica@mazzolalindstrom.com](mailto:jessica@mazzolalindstrom.com)

Dated: Millburn, New Jersey  
April 23, 2025.

REN RONG PAN ATTORNEY AT LAW  
Attorney for Defendant

*[unsigned]*

---

Ren Rong Pan, Esq. (RP-7378)  
75 Main Street, Suite 201  
Millburn, NJ 07041  
(212) 406- 5533/(917)536-8342